

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Developing a Unified Intercarrier)	CC Docket No. 01-92
Compensation Regime)	
)	

**COMMENTS OF
PUBLIC UTILITY COMMISSION OF OREGON
ON
FURTHER NOTICE OF PROPOSED RULEMAKING**

These comments are submitted by the Public Utility Commission of Oregon ("Oregon Commission") in response to the Federal Communication Commission's ("FCC") Further Notice of Proposed Rulemaking in the above-captioned docket adopted February 10, 2005 and released March 3, 2005.

The Oregon Commission has been actively engaged in the work of the National Association of Regulatory Utility Commissioners' ("NARUC") Task Force on Intercarrier Compensation. One of its members, Commissioner Ray Baum, has served as Vice Chair of the Task Force. The Task Force has made a committed and sincere effort to develop a policy blueprint for the difficult, interrelated subjects of intercarrier compensation and universal service reform. This blueprint has gone through many versions and has been continuously improved by the constructive criticism of state regulators and diverse stakeholders at six two-day workshops. This effort stands as a prime example of the value of state participation in telecommunications policy-making.

The Oregon Commission has reviewed Version 7 of the Task Force Proposal as submitted to the FCC in this docket via a recent ex parte. It is in the nature of any consensus-building effort that the result cannot be the first choice of any participant in all areas. Unsurprisingly, Version 7 of the Task Force Proposal does not reflect the first

choice of the Oregon Commission in every area. Taken as a whole, however, Version 7 of the Task Force Proposal represents a sound, well-thought-out blueprint for FCC action in this docket. We urge that it be carefully considered and adopted.

Respectfully submitted,

PUBLIC UTILITY COMMISSION OF OREGON



Lee Beyer
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